

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Inbound E-format Letter Post

Docket No. CP2020-120

**COMMENTS OF THE ASSOCIATION FOR POSTAL COMMERCE
IN RESPONSE TO ORDER NO. 5503**

(May 14, 2020)

In Order No. 5503, the Commission announced its preliminary determination to unseal the specific per-item and per-kilogram self-declared rates for the Inbound Letter Post Small Packets and Bulky Letters product shortly after the Universal Postal Union publishes these rates. The Association for Postal Commerce (“PostCom”) submits these comments in support of the Commission’s determination. There is no difference between the rates proposed in this docket and those proposed in CP2019-155. The Commission should reach the same conclusion in this docket and order the rates disclosed once published by the UPU. *See* Order No. 5451.

As the Commission correctly recognizes in its order, three of the six potential commercial harms identified by the Postal Service would be realized only if financial workpapers are disclosed along with the per-item and per-kilogram rates. Order No. 5503 at 6. Since those workpapers will remain under seal, no harm will result. The Commission also correctly recognizes that there is little, if any, difference between publishing the self-declared rates and publishing rates for competitive products such as Priority Mail, Priority Mail Express, and First-Class Package Service. *Id.* at 13-14. Such rates are regularly published without commercial harm to the Postal Service, and the public interest in oversight of a governmental entity operating in competitive markets requires that the same treatment be applied to the self-declared rates at issue.

PostCom appreciates the Commission's attention to this issue and commends it on reaching a reasonable resolution.

Respectfully submitted,

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